

BIBIYAN LAW GROUP, P.C.

David D. Bibiyan (SBN 287811)

david@tomorrowlaw.com

Jeffrey D. Klein (SBN 297296)

jeff@tomorrowlaw.com

Sarah H. Cohen (SBN 330700)

sarah@tomorrowlaw.com

Rafael Yedoyan (SBN 351499)

rafael@tomorrowlaw.com

1460 Westwood Blvd.

Los Angeles, California, 90024

Tel: (310) 438-5555; Fax: (310) 300-1705

Attorneys for MACKENZIE ANNE THOMA, on behalf of herself
and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MACKENZIE ANNE THOMA, a.k.a
KENZIE ANNE, on behalf of herself
and all others similarly situated
employees,

Plaintiffs,

v.

VXN GROUP LLC, a Delaware limited
liability company; STRIKE 3
HOLDINGS, LLC, a Delaware limited
liability company; GENERAL MEDIA
SYSTEMS, LLC, a Delaware limited
liability company; MIKE MILLER, an
individual; and DOES 1 to 100,
inclusive,

Defendants,

CASE NO. 2:23-cv-04901-WLH

**DECLARATION OF RAFAEL
YEDOYAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER**

DECLARATION OF RAFAEL YEDOYAN

I, RAFAEL YEDOYAN, declare and state:

1. I am an attorney at law, duly licensed to practice before all the Courts of the State of California and I am an attorney with Bibiyan Law Group, P.C, counsel of record for plaintiff Mackenzie Anne Thoma (“Plaintiff” or “Ms. Thoma”) and all others similarly situated and aggrieved. As such, I am familiar with the file in this matter and if called as a witness I could and would competently testify to the following facts of my own personal knowledge.

2. On May 24, 2024, the Parties had an initial meet and confer to discuss the narrowing of the requests in Defendants’ subpoena requests. This meet and confer was fruitless.

3. The Parties had a second meet and confer on May 31, 2024 to discuss, among other items, the potential narrowing of the requests in Defendants’ subpoena. This meet and confer was fruitless.

4. Attached hereto as “Exhibit A” is a true and correct copy of Mainboard, LLC’s privacy policy.

Executed on this Eighteenth of June, 2024, at Los Angeles, California.

/s/ Rafael Yedoyan
Rafael Yedoyan